

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

IN RE NATIONAL PRESCRIPTION
OPIATE LITIGATION

This document relates to:

*County of Summit, Ohio, et al. v. Purdue
Pharma L.P., et al.*

Case No. 1:18-OP-45090

*The County of Cuyahoga v. Purdue Pharma
L.P., et al.*

Case No. 17-OP-45004

MDL No. 2804

Case No. 17-md-2804

Hon. Dan Aaron Polster

**DECLARATION OF JENNIFER D. CARDELUS IN SUPPORT IN SUPPORT OF
MANUFACTURER DEFENDANTS' OPPOSITION TO PLAINTIFFS' MOTION FOR
PARTIAL SUMMARY JUDGMENT ADJUDICATION THAT DEFENDANTS DID NOT
COMPLY WITH THEIR DUTIES UNDER THE FEDERAL CONTROLLED
SUBSTANCES ACT TO REPORT SUSPICIOUS OPIOID ORDERS AND NOT SHIP
THEM**

I, Jennifer D. Cardelus, declare as follows:

1. I am an attorney at the law firm of O'Melveny & Myers LLP and counsel of record for Defendants Johnson & Johnson, Janssen Pharmaceuticals, Inc., Janssen Pharmaceutica, Inc. n/k/a Janssen Pharmaceuticals, Inc., and Ortho-McNeil-Janssen Pharmaceuticals, Inc. n/k/a Janssen Pharmaceuticals, Inc. (collectively "Janssen"), in the above-captioned matter. I submit this declaration in support of Janssen and Johnson and Johnson's Opposition to Plaintiffs' Motion for Summary Judgment. I have personal knowledge of the following facts set forth below and, if called and sworn as a witness, could and would testify competently thereto.

2. Attached here to as Exhibit 40 is a true and correct copy of Exhibit 48 from the deposition of Michele R. Dempsey, taken on March 8, 2019, in Princeton, New Jersey.

3. Attached here to as Exhibit 41 is a true and correct copy of Exhibit 49 from the deposition of Michele R. Dempsey, taken on March 8, 2019, in Princeton, New Jersey.

4. Attached here to as Exhibit 42 is a true and correct copy of Exhibit 50 from the deposition of Michele R. Dempsey, taken on March 8, 2019, in Princeton, New Jersey.

5. Attached here to as Exhibit 43 is a true and correct copy of Exhibit 52 from the deposition of Michele R. Dempsey, taken on March 8, 2019, in Princeton, New Jersey.

6. Attached here to as Exhibit 44 is a true and correct copy of Exhibit 46 from the deposition of Michele R. Dempsey, taken on March 8, 2019, in Princeton, New Jersey.

7. Attached here to as Exhibit 45 is a true and correct copy of Exhibit 51 from the deposition of Michele R. Dempsey, taken on March 8, 2019, in Princeton, New Jersey.

8. Attached here to as Exhibit 46 is a true and correct copy of Exhibit 54 from the deposition of Michele R. Dempsey, taken on March 8, 2019, in Princeton, New Jersey.

9. Attached here to as Exhibit 47 is a true and correct copy of a document produced by Janssen in this case, bearing beginning Bates Number JAN-MS-05433746.

10. Attached here to as Exhibit 48 is a true and correct copy of excerpts from the deposition of Michael Mapes, dated July 11, 2019.

11. Attached here to as Exhibit 49 is a true and correct copy of a document produced by Janssen in this case, bearing beginning Bates Number JAN-MS-03124082.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct and that this Declaration was executed in Los Angeles, California on July 29, 2019.

/s/ Jennifer D. Cardelus
Jennifer D. Cardelus